

post-trial in any event; and (3) Centocor's demands, if permitted, will amount to significant additional costs that can easily be avoided by taking all such discovery after the liability trial has been concluded.

WHEREFORE, Plaintiffs respectfully request this Court:

1. Grant Plaintiffs' Motion for a Protective Order to postpone further discovery on Abbott's request for a permanent injunction until after a finding of infringement and before any Court proceedings on the permanent injunction issue; and
2. Grant such further relief as the Court deems proper.

Respectfully Submitted,

Dated: February 25, 2011

/s/ Robert J. Gunther, Jr.

Robert J. Gunther, Jr. (admitted *pro hac vice*)
Jane M. Love (admitted *pro hac vice*)
Violetta G. Watson (admitted *pro hac vice*)
Julia A. Grimes (admitted *pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, New York 10022
Tel: (212) 230-8800
Fax: (212) 230-8888

William F. Lee (BBO #291960)
Anne M. McLaughlin (BBO # 666081)
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Tel: (617) 526-6000
Fax: (617) 526-5000

William G. McElwain (BBO # 332510)
Amy K. Wigmore (admitted *pro hac vice*)
Rachel L. Weiner (admitted *pro hac vice*)
WILMER CUTLER PICKERING
HALE and DORR LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Tel: (202) 663-6000
Fax: (202) 663-6363

William W. Kim (admitted *pro hac vice*)
WILMER CUTLER PICKERING
HALE and DORR LLP
950 Page Mill Road
Palo Alto, California 94304
Tel: (650) 858-6000
Fax: (650) 858-6100

*Attorneys for Abbott GmbH & Co., KG,
Abbott Bioresearch Center, Inc., and Abbott
Biotechnology, Ltd.*

**CERTIFICATION OF COMPLIANCE WITH FEDERAL RULE OF CIVIL
PROCEDURE 26(c)(1)**

I certify that Plaintiffs' counsel has conferred in good faith with opposing counsel on the matter set forth herein.

/s/ Robert J. Gunther, Jr.
Robert J. Gunther, Jr.

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 37.1

I certify that the provisions of Local Rule 37.1 have been complied with.

/s/ Robert J. Gunther, Jr.
Robert J. Gunther, Jr.

CERTIFICATE OF SERVICE

I certify that, on February 25, 2011, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Robert J. Gunther, Jr.
Robert J. Gunther, Jr.